

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

**DEFENDANT'S MOTION TO FILE UNREDACTED
MOTION TO COMPEL DISCOVERY UNDER SEAL**

Now comes the defendant Benjamin Shacar and requests that the Court allow the defendant to file his Unredacted Motion to Compel Discovery dated March 4, 2024, under seal.

In support of this motion, the defendant states that some of the content contained in the motion to compel contains information which would be protected under ¶3 of the protective order approved by Magistrate Judge Robertson in this case on July 14, 2021. [Dkt. 25].

Respectfully submitted,

BENJAMIN SHACAR

/s/ William J. O'Neil
WILLIAM J. O'NEIL
Attorney for the Defendant
280 N. Main St., Ste. 6
East Longmeadow, MA 01028
(413) 224-2694
BBO#:548445

CERTIFICATE OF SERVICE

I hereby certify that true copies of this document will be served on the registered parties through the ECF system on this date March 4, 2024.

/s/ William J. O'Neil
William J. O'Neil
280 N. Main Street, Ste. 6
E. Longmeadow, MA 01028
(413) 224-2694
BBO#: 548445